

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA	:	Case No. 18-CR-109
	:	
v.	:	Judge Timothy S. Black
	:	
ANDREY SHUKLIN, et al.,	:	JOINT STATUS REPORT
	:	
Defendants.	:	
	:	

The Government submits this joint status report to the Court relating to the above-captioned case and states as follows:

On July 25, 2018, a federal grand jury returned a one-count Indictment against twelve defendants, charging the defendants with participating in a multiyear RICO Conspiracy in violation of 18 U.S.C. § 1962(d) relating to the transportation of household goods. (Doc. 3 (Indictment).) To date, eight of the twelve defendants have been arrested and appeared in this District. The government considers the four defendants who have not yet been apprehended as fugitives.

Shortly after the first defendant appeared in this District, the government began providing discovery. Discovery in this matter is voluminous—it includes, among other things, over 80 forensically imaged computers, multiple email accounts, bank records, and corporate and customer files and documents, including evidence seized during post-Indictment search warrants of multiple warehouses located all over the country where customer goods were being stored.¹ As a result, the government has been providing discovery on a rolling basis.

¹ With cooperation and assistance from defendants, in the months following the Indictment, agents facilitated the recovery of household goods to approximately 200 customers from warehouses and storage units throughout the country.

The parties have been working collaboratively to resolve any discovery issues. On March 28, 2019, the government and available defense counsel participated in a conference call to discuss the status of discovery and to devise a strategy for producing and reproducing certain discovery in a way that is both cost-effective for defendants and allows counsel to access and review all materials in the most efficient manner. The government will continue to work with defense counsel to address any discovery concerns that may arise.

The government has provided this status report to all current counsel for defendants of record who have appeared to date, and they concur with its content.

The parties respectfully request a conference to discuss scheduling at the Court's convenience.

Respectfully submitted,

BENJAMIN C. GLASSMAN
United States Attorney

/s/ Matthew C. Singer

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed with the Court's CM/ECF System this 9th day of April 2019, which provides electronic notice to all parties.

/s/Matthew C. Singer

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